

## COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG  
LONDON LOS ANGELES NEW YORK SAN FRANCISCO  
SEOUL SHANGHAI SILICON VALLEY WASHINGTON

Andrew Soukup

Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5066  
asoukup@cov.com

October 31, 2018

Via Electronic Case Filing

Hon. Denis R. Hurley  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: *Bibicheff v. Chase Bank USA, N.A.* (2:17-cv-04679)—  
Defendant Chase Bank USA, N.A.’s Unopposed Request  
for Extension of Time to Answer Complaint**

Dear Judge Hurley:

By this letter motion, Defendant Chase Bank USA, N.A. (“Chase”), submits this unopposed request for the Court to extend Chase’s deadline to answer the Complaint to January 31, 2019.

Chase’s response is currently due on October 31, 2018. The parties have scheduled a settlement conference with Magistrate Judge Shields for January 23, 2019, the first date that the Court and the parties were available. *See* Oct. 31, 2018 Electronic Scheduling Order. The parties believe it would be most efficient to postpone the submission of Chase’s answer until after the settlement conference.

Accordingly, Chase respectfully requests that the Court grant an extension of Chase’s deadline to answer the Complaint to January 31, 2019. Oren Giskan, counsel for Plaintiff, has consented to this extension. This is Chase’s second request for an extension of time to answer the Complaint since the Court’s ruling on Chase’s Motion to Dismiss, the first of which was granted. Prior to that ruling, Chase requested two extensions of time to respond to the Complaint, both of which were granted.

Respectfully submitted,

/s/ Andrew Soukup  
Andrew Soukup

*Attorney for Chase Bank USA, N.A.*